

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF DELAWARE

STEPHANIE LYNN FORD,

Plaintiff,

v.

CHRISTIANA CARE HEALTH
SYSTEMS, RICHARD BURTON, AND
CLARA CLARK

Defendants.

CIVIL ACTION NO. 06-301(***)

JURY TRIAL

FILED
CLERK U.S. DISTRICT COURT
DISTRICT OF DELAWARE
2007 MAR 13 PM 12:52

Plaintiffs' Interrogatory Motion Against The Defendants, Christiana Care Health Systems, Richard Burton ,
and Clara Clark.

1. Plaintiff, Stephanie Lynn Ford, resides at 19 Albany Ave. Newcastle, Delaware 19720
2. Defendants, Christiana Care Health Systems, Richard Burton, and Clara Clark, / ATTORNEYS FOR THE DEFENDANTS, David H. Williams (#616) , James H. McMackin (#4284), MORRIS JAMES LLP. , 500 Delaware Avenue , Suite 1500 P.O. Box 2306 Wilmington, Delaware 19899, MICHAEL J. OSSIP, THOMAS S. BLOOM, MORGAN, LEWIS & BOCKIUS LLP., 1701 Market Street Philadelphia, PA. 19103.

INTERROGATORIES:

3. I the Plaintiff, Stephanie Lynn Ford have filed 2 Motion To Compel to obtain these documents from the defendants.
4. Why was the Plaintiff's employment terminated at Christiana Care Health Systems?
5. Why did Mrs. Sharon PeitLock and Mrs. Edith Green-Crews terminate the plaintiff's employment?
6. Why are the Annual Pension Payments are not being paid to the Plaintiff's Pension Fund? Please attach the reason, the payments were stop being made to the Pension Fund to answer this interrogatory.
7. Who is the person or persons that terminated the plaintiff's Pension Fund? Please forward the names and dates, and attached a copy of the original Pension Fund to answer this interrogatory.
8. For what reason, was the plaintiff's Annual Pension Payments Terminated?

(1)

14 TOTAL
pages

9. Why was the plaintiff's Medical Benefits Terminated? Please forward a copy of the original copy to the plaintiff to answer this interrogatory.
10. Who is responsible for terminating the plaintiff's Medical Benefits? Please forward a copy of the original copy to the plaintiff to answer this interrogatory.
11. Why was the plaintiff's \$75,000 Life Insurance Policy cancelled? Please forward a copy of the original copy to the plaintiff to answer this interrogatory.
12. Who cancelled the plaintiff's \$ 75,000 Life Insurance Policy ? Please forward me a copy of the original copy of the names and date the policy was cancelled.
13. What cause the defendants to cancel the Life Insurance Policy? Please forward me a copy of the original copy that the defendants based there decision upon.
14. Who is the person or persons that filed the subpoena to obtain the \$ 75,000 life Insurance policy, from Unum Life Insurance Company Of America ? Please forward me a copy of the original subpoena and the court it was filed in.
15. Why was the Plaintiff's Long-Term Disability Insurance Terminated? Please forward me a copy of the long-term disability original copy to answer the interrogatory.
16. Who is person or persons that terminated the plaintiff's Long-Term Disability Insurance? Please forward me the names and dates the Insurance Policy was terminated . Please send me a copy of the original copy to answer this interrogatory.
17. Why was the Plaintiff's Retiree Benefits terminated ? Please attach a copy of the original copies Retiree termination form to answer this interrogatory.
18. Who were the person or persons that terminated the Plaintiff's Retiree Benefits? Please provide the names and dates the Retiree Benefits were terminated. Please forward me a copy of the original copy to answer this interrogatory.
19. Why was the Plaintiff's not rehired in a position at the Christiana Care? Please forward me a copy of the original copy as to why the Plaintiff did not get rehired in a position.
20. Why did Mr. Richard Burton refuse to rehire the Plaintiff in a position at the Christiana Care Health Systems? Please provide a copy of the original copy of his conclusion to not rehire the Plaintiff to answer this interrogatory.

(2)

21. Why was the Plaintiff's Personal Accident Insurance Terminated? Please forward a copy of the original copy , the reason the personal accident was terminated.

22. Who are the person or persons that terminated the Personal Accident Insurance? Please provide the names and date the Personal Accident Insurance was Terminated, by forwarding me a copy of the original copy to answer this interrogatory.

23. Why was the Plaintiff's Dental Insurance Terminated? Please forward me copy of the original copy, the reason the Dental Insurance was Terminated.

24. Who are the person or persons that terminated the Plaintiff's Dental Insurance Benefits? Please forward me copy of the original copy the reason the Dental Insurance Benefits were terminated.

25. Why didn't the Plaintiff get rehired in any of the 29 jobs , from May 21, 2004 To July 2, 2004? Please show cause why the Plaintiff did not get rehired during these dates.

26. Who are person or persons that refuse to rehire the Plaintiff during May 21, 2004 To July 2, 2004? Please show cause why the Plaintiff was not rehired at Christiana Care, by forwarding me a copy of the original copy decision to answer this interrogatory.

I the Plaintiff Stephanie Lynn Ford have attached the 29 jobs Intensive Job Search Log Sheets, Employee Termination Form D0195 and the Pension Information D0197.

Please note that the Termination Form D0195 and the Pension Information D0197 were sent to me by Mrs. Kendra L. Baisinger, Esq. Morgan, Lewis & Bockius LLP. 1701 Market Street , Philadelphia, PA 19103.

I the Plaintiff, Stephanie Lynn Ford ask this Honorable Court to Grant the Plaintiff's Complaint.

Sincerely,

Stephanie L. Ford 3/13/07

Stephanie L. Ford 3-13-07

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Paul, Elaine

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From: FWZBXQ0@christianacare.org
Sent: Friday, April 23, 2004 2:06 PM
To: FormHRCCHSHRPemp@christianacare.org
Cc: FWZBXQ0@christianacare.org; vfeiner@christianacare.org
Subject: FORD, STEPHANIE - TERMINATION FORM

The following information was submitted from an INet Form called
TERMINATION FORM by Green-Crews, Edith.

Employment Assignment: - FormHRCCHSHRPemp@christianacare.org
*Employee Name: - FORD, STEPHANIE
*Employee SSN#: - 222565931
*Cost Center: - 26541
*Last Day Worked: - 10/27/03 ✓
*Term Effective Date: - 04/13/04 ✓
*Eligible for Unused PTO Hrs: - Yes ✓
*Would You ReEmploy: - Yes ✓
Voluntary Reason Code: - 100 Unable to Return from Medcial LOA
Involuntary Reason Code: - None
Comments: - EMPLOYEE HAS EXHAUSTED HER 24 WK LEAVE P
ERIOD.

*Approval: - PEITLOCK, SHARON
Date Completed: - 4/23/2004
Completed By: - Green-Crews, Edith

Date Sent: 4/23/04
Time Sent: 2:06:05 PM

D0195

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5/5/04

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PENSION INFORMATION

DATE NOVEMBER 14, 2006

NAME OF PENSIONER: STEPHANIE FORD
SOCIAL SECURITY NO: 222-56-5931
DATE OF BIRTH: 02/16/1962 POSITION: CLERK III
DEPARTMENT/DIVISION: X-RAY - WILMINGTON
EMPLOYMENT DATE: 08/24/1987
SEVERANCE FROM SERVICE DATE: 04/13/2004
RETIREMENT DATE: 03/01/2027
TYPE OF RETIREMENT: TERMINATED VESTED
DATE PAYMENTS COMMENCE: 03/01/2027
PARTICIPATION DATE: _____
CREDITED SERVICE: 07 MOS 24 DAYS FT
15 YRS 11 MOS 25 DAYS FT (.16267)
FINAL AVERAGE EARNINGS (Monthly) \$2127.14
SETTLEMENT OPTION: _____
ANNUAL AMOUNT: \$4671.24
MONTHLY INCOME: \$389.27
AGE AT TERMINATION: 42 YRS 01 MOS 27 DAYS
NRD: 03/01/2027

(5)

(15)

D0197

Week ____ of ____

me Stephanie Paul
tes 5/18/04 to 5/21/04INTENSIVE JOB SEARCH LOG

use provide & submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax form filled in copy of newspaper ad, email address of job listing, copy of website posting, etc. Minimum of 5 job searches per week.

| Date | Job Title | Telephone # / Fax # | Company/Contact Name | Results |
|---------|---|---------------------|--------------------------|-----------------------|
| 5/21/04 | Team Coordinator / ⁹⁰⁸ recruiter | (302) 428-5746 | Christiana Care Hospital | Completed application |
| 5/21/04 | Unit Clerk VI / ⁽³⁰²⁾ | 428-5746 | Christiana Care Hospital | Completed application |
| 5/21/04 | Patient Information Rep. / ⁽³⁰²⁾ | 428-5746 | Christiana Care Hospital | Completed application |
| 5/21/04 | Patient Care Technician / ⁽³⁰²⁾ | 428-5746 | Christiana Care Hospital | Completed application |
| 5/21/04 | Receiving Clerk / ⁽³⁰²⁾ | 428-5746 | Christiana Care Hospital | Completed application |

Search results verified by: _____ Date: _____

Additional Comments: _____

Week ____ of ____

Name Stephanie Ford

Dates 5/24/04 to 5/28/04

INTENSIVE JOB SEARCH LOG

Please provide & submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax (trans. initial form, copy of newspaper ad, email address of job listing, copy of website posting, etc. Minimum of 5 job searches per week.

| Date | Job Title | Telephone // Fax // | Company/Contact Name | Results |
|---|--|---------------------|---------------------------------|-----------------------|
| 5/28/04 | Clerk | (302) 428-5746 | Christiana Care Hospital/Burton | Completed application |
| Notes | My job recruiter is Mr. Rich Burton (302) 428-5746 | | | |
| 5/28/04 | Unit Clerk | (302) 428-5746 | Christiana Care Hospital/Burton | Completed application |
| Notes | | | | |
| 5/28/04 | Clerk | (302) 428-5746 | Christiana Care Hospital/Burton | Completed application |
| Notes | | | | |
| 5/28/04 | Duplication Operator | (302) 428-5746 | Christiana Care Hospital/Burton | Completed application |
| Notes | | | | |
| 5/28/04 | Health Records Clerk | (302) 428-5746 | Christiana Care Hospital/Burton | Completed application |
| Notes | | | | |
| Job Search results verified by: _____ Date: _____ | | | | |

Additional Comments:

Name Stephanie Jink

Week of 14

Dates 6/31/04 to 6/4/04

INTENSIVE JOB SEARCH LOG

Please provide & submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax form, initial form, copy of newspaper ad, email address of job listing, copy of website postings, etc. Minimum of 5 job searches per week.

| Date | Job Title | Telephone # / Fax # | Company/Contact Name | Results |
|--------|--------------------|---------------------|-----------------------------------|----------------------|
| 6/4/04 | OR Tech | (302) 428-5746 | Christiana Care Hospital / Boston | Complete application |
| 6/4/04 | Admin. Asst. | (302) 428-5746 | Christiana Care Hospital / Boston | Complete application |
| 6/4/04 | Clerk II | (302) 428-5746 | Christiana Care Hospital / Boston | Complete application |
| 6/4/04 | Career Development | (302) 428-5746 | Christiana Care Hospital / Boston | Complete application |

Additional Comments:

Name Stephanie Ford
 Dates 6/7/04 to 6/11/04

INTENSIVE JOB SEARCH LOG

Please provide & submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax transmittal form, copy of newspaper ad, email address of job listing, copy of website posting, etc. Minimum of 5 job searches per week.

| Date | Job Title | Telephone // Fax // | Company/Contact Name | Results |
|---------|--|---------------------|-------------------------------|-----------------------|
| 6/11/04 | Home Health Assistant | (302) 428-5746 | Christiana Care Hospital | Completed application |
| Notes | Interview - 6/9/04 clerk position / Christiana Care Hospital / 5C 5th floor. | | | |
| 6/11/04 | Berkle - | (302) 428-5746 | Christiana Care Hospital | Completed application |
| Notes | | | | |
| 6/11/04 | Consignement Consultant | (302) 428-5746 | Christiana Care Hospital | Completed app |
| Notes | | | | |
| 6/11/04 | Service Consultant | (302) 428-5746 | Christiana Care Hospital | Completed app (5) |
| Notes | | | | |
| 6/11/04 | Scheduler | (302) 428-5746 | Christiana Care Hospital | Completed app |
| Notes | | | | |
| 6/12/04 | Correctional Officer | (302) 739-5458 | The Employee Relations Center | Completed application |
| Notes | | | | |

Job Search results verified by:

Date:

Call Delaware Tech College
 Mrs. Cecelia
 (302) 830-5209

Additional Comments:

Have appointment Philadelphia 6/15/04
 Employment Services at Delaware Tech
 August 5, 2004
 10:00 To 12:00

Week ____ of 4

Name Stephanie Ind
Dates 6/14/04 to 6/18/04
INTENSIVE JOB SEARCH LOG

Please provide & submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax transmitted form, copy of newspaper ad, email address of job listing, copy of website posting, etc. Minimum of 5 job searches per week.

| Date | Job Title | Telephone // Fax // | Company/Contact Name | Results |
|----------------------------------|---|---------------------|-------------------------|-----------------------|
| 6/15/04 | Medical Records Clerk (302) 451-4000 | | A.I. Dupont Hospital | Completed Application |
| Notes | | | | |
| 6/15/04 | Laundry aide & Environmental Services | | St. Francis Hospital | Completed Application |
| Notes | | | | |
| 6/18/04 | Home Health Training Program (302) 428-5746 | | ChristianaCare Hospital | Completed Application |
| Notes | | | | |
| 6/18/04 | Assistant Program (302) 428-5746 | | ChristianaCare Hospital | Completed Application |
| Notes | | | | |
| 6/18/04 | Security Officer (302) 428-5746 | | ChristianaCare Hospital | Completed Application |
| Notes | | | | |
| 6 | | | | |
| Notes | | | | |
| Job Search results verified by : | | | | Date: |

Additional Comments:

NAME Stephanie
 Dates 6/21/04 to 6/25/04

INTENSIVE JOB SEARCH LOG

Please provide & submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax forms, initial copy of newspaper ad, email address of job listing, copy of website posting, etc. Minimum of 5 job searches per week.

| Date | Job Title | Telephone // Fax // | Company/Contact Name | Results |
|---------|-------------------------------------|---------------------|-------------------------------------|--------------------------|
| 6/24/04 | Residency Program Assistant / | | Christiana Care Hospital / | Completed application |
| 6/24/04 | Collection Specialist / | | Health / Christiana Care Hospital / | Completed application |
| 6/24/04 | Operations Support Specialist / | | Delaware Psychiatric Center / | Completed application |
| 6/25/04 | Home Health Care Aide / | | Christiana Care Hospital / | Completed application |
| 6/25/04 | Expirial Technician / | | Christiana Care Hospital / | Completed application |
| 6/25/04 | Measured Phone Call - Mr. John Judy | 428-5768 | about Home Health Resection 7/1/04 | Christiana Care Hospital |

Search results verified by :

Date:

Additional Comments:

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Stehausen 4000

6/28/02 to 7/1/02

4. Please provide & submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax/fans, internet
5. min. copy of newspaper ad, email address of job listing, copy of website posting, etc. Minimum of 5 job searches per week.

ANSWER

Interview - 7/2/04 Clerk Position / Chinatown in Hospital Cases /

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Date:

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Name Stephanie FordWeek of 4Dates 7/5/04 to 7/9/04INTENSIVE JOB SEARCH LOG

Please provide & submit proof of your job search efforts to your Case Manager weekly. Acceptable documentation will be fax transmittal form, copy of newspaper ad, email address of job listing, copy of website posting, etc. Minimum of 5 job searches per week.

| Date | Job Title | Telephone # /Fax # | Company/Contact Name | Results |
|-----------------|----------------------------|---------------------|----------------------------------|------------------------------|
| 1 <u>7/7/04</u> | <u>clerk</u> | <u>802 395-0400</u> | <u>Stater Service Group</u> | <u>completed application</u> |
| Notes | | | | |
| 2 <u>7/7/04</u> | <u>Security Officer</u> | | <u>Bearrett Security Service</u> | <u>completed application</u> |
| Notes | | | | |
| 3 <u>7/8/04</u> | <u>Security Officer</u> | | <u>Allied Security</u> | <u>completed application</u> |
| Notes | | | | |
| 4 <u>7/8/04</u> | <u>Wooty Temp Services</u> | | <u>Security Officer</u> | |
| Notes | | | | |
| 5 | | | | |
| Notes | | | | |
| 6 | | | | |
| Notes | | | | |

Job Search results verified by: _____ Date: _____

Additional Comments:

CERTIFICATE OF SERVICE

THE UNDERSIGNED HEREBY CERTIFIES
THAT COPIES OF THE FOREGOING
WERE CAUSED TO BE SERVED THIS
13, MARCH 2007 UPON THE
FOLLOWING IN THE MANNER INDICATED:

U.S. Certified Mail

MORGAN, LEWIS & BOCKIUS LLP
/James H. McMackin.III
1701 MARKET STREET
PHILADELPHIA , PA 19103-2921,

David H. Williams
Morris James LLP,
500 Delaware Avenue, Suite 1500
P.O. Box 2306
Wilmington, Delaware 19899

Stephanie L. Ford